

File ACT
Atlas main file
Atlas Minerals
Division of Atlas Corporation
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DIVISION OF
OIL, GAS & MINING

JIM

FEB 28 1984

February 21, 1984

*cc: Ran D.
Jim S.*

Mr. James W. Smith, Jr.
Division of Oil, Gas and Mining
4241 State Office Building
Salt Lake City, Utah 84114

RE: Annual Operations and Progress Report

Dear Mr. Smith:

Enclosed please find the subject reports for 1983 for each of Atlas' twenty-one permitted mines in the State of Utah.

We are submitting these reports on the Division's 1980 MR Form 3 rather than the recently revised 1984 Form 3. We do not believe the revised form is applicable to our operations for several reasons. These are:

- ° The forms were developed without the opportunity to review and comment. This would appear to be a procedural deficiency. It has been our understanding that affected industries will be provided such opportunity when new requirements are being considered. We are not aware that any such opportunity was made available.
- ° The requirements inherent to the new form place an undue and unnecessary burden on Atlas and other mining firms which might have a substantial number of pre-existing mines permitted under the Mined Land Reclamation Act. The estimated manpower and resources necessary to satisfy the new form would, in our opinion, constitute an unfair burden on Atlas. This is particularly so at the present time, since we are placing our operations in standby until the uranium market improves to allow for ongoing viable operations. Due to this action, we will not have the manpower required to develop the requested information.
- ° The 1980 MR Form 3 has been acceptable in the past. This form has provided the guidance for data collection in the past. To change this report requirement for existing operations, resulting in a substantial economic burden, does not seem reasonable.
- ° For the most part, the form seems to be designed for fairly large open pit or strip mining operations. It does not appear to be applicable to relatively small underground mining activities.

Atlas Minerals
Division of Atlas Corporation

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- ° The Moab Mill is not permitted under the Mined Land Reclamation Act and an annual report has never before been required for this operation. Therefore, we have not provided an annual report for it.

I trust the enclosed annual reports will be accepted as fulfilling the requirements under Rule M-8-Reports. If the Division finds that it cannot accept the reports on the old form, we would be willing to discuss this matter with you, or if necessary, the Board of Oil, Gas and Mining. Please contact me directly at your convenience if you have any questions.

Sincerely,



Richard E. Blubaugh
Regulatory Affairs Manager

cc: R. Lewis
R. Broschat
J. Holtkamp (Van Cott, Bagley, et al)

Encl.

REB/jl